



## T. A. BLACKBURN LAW

TYRONE A. BLACKBURN

MEMBER OF  
NY & NJ BAR

FEDERAL MEMBERSHIP  
EDNY, SDNY, & DNJ

1242 EAST 80<sup>TH</sup> STREET, 3<sup>RD</sup> FLOOR  
BROOKLYN, NY 11236

September 1, 2021

**Hon. Judge Madeline Cox Arleo**

*United States District Court*

*District of New Jersey*

50 Walnut Street #4015

Newark, NJ 07102

### Update on Service of Process

Re: **Miller v. Johnson C. Smith University, INC. et al. No. 2:21-cv-15313 MCA-MAH**

Dear Judge Arleo,

I am an attorney duly admitted to practice before this Court. In the above matter, my law firm T. A. Blackburn Law, PLLC., is the attorney for Plaintiff Queen Miller ("Ms. Miller").

We write to inform you that my office is in contact with Johnson C. Smith University's ("JCSU") current counsel, Parker, Poe, Adams & Bernstein, LLP. They are assessing if JCSU will allow them to accept service of process under rule 4 for the FRCP. Additionally, the following defendants are current or recent employees of JCSU, and the firm is also assessing whether JCSU intended to indemnify them and have Parker Poe represent them. The defendants are Upward Bound, Michael Gardner, Magdalyn Lowe-Smith, Treva Norman, and Kathleen Jackson.

Defendants Michael Peterson and Dorothy Cowser Yancy have been served. If JCSU refuses to accept services under rule 4 of the FRCP by September 3, 2021, we will file a motion for an extension of time to serve the remaining defendants individually.

Respectfully,

*Tyrone A. Blackburn, Esq.*

Tyrone A. Blackburn, Esq.  
T. A. Blackburn Law, PLLC.